

UNITED STATE BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLAND DIVISION

IN RE:

CASE NO.6:19-BK-00511-KSJ

IPS WORLDWIDE, LLC

CHAPTER 11

Debtor

---

**MOTION TO RESCHEDULE HEARING ON APRIL 5<sup>TH</sup>, 2019 AT 11:00AM OF  
EXFREIGHT ZETA, LLC TO STRIKE DEBTOR'S STATEMENT OF FINANCIAL  
AFFAIRS FOR NON-INDIVIDUALS FILING FOR BANKRUPTCY PART 13, No.25.1  
(de-92 Page 32 of 38) and DEBTOR'S AMENDED STATEMENT OF SCHEDULES  
FINANCIAL AFFAIRS FOR NON-INDIVIDUALS FILING FOR BANKRUPTCY PART  
13, No.25.1 (de-100 Page 15 of 19) AND MOTION TO COMPEL DEBTOR TO REMOVE  
ALL REFERENCES TO EXFREIGHT AND ITS OFFICES ON DEBTOR'S WEBPAGE**

Exfreight Zeta, LLC. (“**ZETA**”) hereby respectfully moves this Court to reschedule the hearing on April 5<sup>th</sup>, 2019 at 11:00 am (the “Hearing”) on **ZETA**’s Motion to Strike a section of Debtor’s Statement of Financial Affairs for Non-Individuals Filings for Bankruptcy Part 13, No. 25.1 (de-92 page 32 of 38) and Debtor’s Amended Statement of Schedules Financial Affairs for Non-individuals filing for bankruptcy Part 13, No.25.1 (de-100 Page 15 of 19) (collectively the “Pleadings”) under Federal Rules 12(f) as being untrue, defamatory and scandalous as it relates to Debtor having equity interest of 51% in **ZETA** and Motion to Compel Debtor to Remove all references to Exfreight and Exfreight’s offices on Debtor’s Webpage pursuant to 11 U.S.C §105 (collectively the “Motion”), as follows:

Background

1. On March 1, 2019, Ex-Freight Zeta filed the Motion. (DE-175)
2. This matter was scheduled to be heard on April 5, 2019 at 11:00 am.

3. The undersigned counsel's wife is scheduled to have surgery on April 5, 2019 in Jupiter, Florida. This surgery has been scheduled for a period of time prior to the Court rescheduling the Hearing on March 19, 2019 (see Court's Order at DE. 219) to April 5, 2019 at 11:00 am.
4. The undersigned's counsel is a sole practitioner and the undersigned does not have another member of the firm to argue the said Motion on April 5, 2019.
5. This Motion was filed in good faith and not for the purpose of delay.

**WHEREFORE**, the undersigned counsel on behalf **ZETA** respectfully requests this Court to reschedule the Hearing on ZETA's Motion to another date that is later than the current scheduled hearing on April 5, 2019 at 11:00 am, any other relief this court deems just and proper.

Respectfully Submitted,

Michael A. Kaufman, P.A.  
1615 Forum Place, Suite 3A  
West Palm Beach, Florida 33401  
Telephone: (561) 478.2878  
Facsimile: (561) 584-5555  
michael@mkaufmanpa.com

By /s/ Michael A. Kaufman  
Michael A. Kaufman  
Florida Bar Number: 628042  
Attorney for Exfreight Zeta, LLC

**CERTIFICATE OF SERVICE.**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed with the Clerk of the Court and served electronically via the Court's EM/ECF System on all registered counsel of records and interested parties on this 25<sup>th</sup> day of March, 2019.

BY: /s/ Michael A. Kaufman  
MICHAEL A KAUFMAN